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June 14, 2002

VIA ELECTRONIC DELIVERY

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: **Notice of Ex Parte Presentation:**
Telephone Number Portability, CC Docket No. 95-116

Dear Ms. Dortch:

On June 13, 2002, the undersigned counsel, on behalf of Missouri RSA No. 7 Limited Partnership d/b/a Mid-Missouri Cellular, Illinois Valley Cellular RSA 2-I Partnership, Illinois Valley Cellular RSA 2-II Partnership, Illinois Valley Cellular RSA 2-III Partnership, Public Service Cellular, Inc., Northwest Missouri Cellular Limited Partnership, California RSA No. 3, Limited Partnership d/b/a Golden State Cellular, and Farmers Cellular Telephone, Inc., along with John Kuykendall of Kraskin, Lesse & Cosson, LLP, on behalf of the Rural Cellular Association, and Caressa D. Bennet of Bennet & Bennet, PLLC, on behalf of the Rural Telecommunications Group, met with Barry Ohlson, Jared Carlson, Patrick Forster and Jennifer Salhus of the Wireless Telecommunications Bureau. Also present at the meeting were Mitch Kaufman of NCS Pearson International ("NCS Pearson"), Michael Altschul and Lori Messing of the Cellular Telecommunications and Internet Association ("CTIA"), and Susan Wichman of Cingular Wireless. Present via telephone conference were Mary Lany of NCS Pearson, Britney Bowen of CTIA and Scott Freiermuth of Sprint PCS.

The substance of this meeting was exploring alternatives which could allow NCS Pearson to proceed with grandfathering NPA-NXX codes without requiring carriers to sign the MBI User Agreement which is at issue. In response to a proposal which had been previously made on behalf of the Kurtis & Associates, P.C. ("K&A") clients to NCS Pearson, NCS Pearson advised that it had prepared a draft "grandfathering only agreement" that would allow carriers to grandfather their existing NPA-NXX codes before June 28, 2002. NCS Pearson provided an outline of the "grandfathering only agreement", a copy of which is appended hereto. NCS Pearson advised that it would not be able to circulate a draft of that agreement unless and until the MBI Oversight LLC ("MBIO") had approved the draft. NCS Pearson and CTIA agreed to ask the MBIO to have the draft circulated to all present by June 18, 2002.

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Some discussion took place on the underlying MIN/MDN separation issue and whether there was any need for rural carriers to split the MIN/MDN in order to meet their FCC obligations. The various parties reiterated the positions set forth in their various comments and previous ex parte filings and CTIA agreed that the MIN/MDN separation was not FCC-mandated, that the MBI administration role was being filled by NCS Pearson as a private contractor to the MBIO and that there would be nothing to prohibit the establishment of alternative means for MBI administration if the parties were ultimately unable to come to terms.

Pursuant to section 1.1206(b) of the Commission's Rules (47 C.F.R. §1.1206(b)), this letter is being filed electronically in the above-referenced docket. If there are any questions regarding this matter, please contact the undersigned.

Very truly yours,

/s/ Michael K. Kurtis

Michael K. Kurtis

Enclosure

Proposal for "Grandfathering Only" Service

MBI Administration

6/12/02

- Carrier will submit, normal Form A (Contact, Service Account, optional Sub-Account) and payment. In comments, they will indicate their desire to be set up as "Grandfathering Only."
- There is no requirement to sign the existing User Agreement, but there will be an agreement that is being developed specifically for this service that will require signature.
- Once confirmation is received by the Carrier, they can begin the Grandfathering process. **Carrier will not be provided with a login to the web site for the "Grandfathering Only" service. All Grandfathering will be performed using FAX application forms.** The additional surcharges to manually handle the FAX applications will still apply.
- Carrier can begin Grandfathering using the FAX Form A1 (up until June 28, 2002).
- Carrier can elect to use "pre-population" if selected during the Form A just like the full MBI Administration service.
- Carrier can utilize either FAX Form C or the spreadsheet Form C between July 15, 2002 and August 19, 2002).
- Emailed or FAX confirmations will be returned to the Carrier.
- Carrier is required to Confirm and Pay for their Grandfathered MBIs using FAX Form F.
- A standard report will be sent on to all registered service account holders on July 15, 2002 containing those MBIs that have been Grandfathered as of June 28, 2002. If Carrier would like to see a report of the MBIs that they have Grandfathered before or after the report is sent on July 15, 2002, they can request a report from the MBI Administrator for a fee to be determined.
- Following the September 3, 2002 Grandfathering period, the Carrier will NOT be able to obtain additional MBIs normally applied for through Form B.
- In order to obtain new MBIs after the Grandfathering period, the Carrier must sign the full User Agreement and then the "Grandfathering Only" service will be converted to the full service for a fee to be determined.
- After confirmation is received that full service has been established for the carrier, Form B web applications can be used to apply for new MBIs.

CERTIFICATE OF SERVICE

I, Ruth E. Garavalia, a secretary with the law firm of Kurtis & Associates, P.C., do hereby certify that I have this 14th day of June 2002, had copies of the foregoing "Notice of Ex Parte Presentation" sent via Electronic Mail to the following:

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/s/ Ruth E. Garavalia

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